BPM

Information under the EU Disclosure Regulation

(Regulation (EU) 2010/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector)

We are obliged by law to give the following information.

We have no intention to promote ecological or social characteristics in our investment strategies or for other specific financial instruments.

Our attitude towards sustainability in asset investment

As part of its social responsibility, BPM desires to make a contribution to doing business in a more sustainable, resource-efficient manner, with the particular goal of reducing the risks and impacts of climate change. Besides keeping sustainability goals within our own organisation, we see it as our responsibility to make BPM's customers aware of aspects of sustainability. Therefore, as part of our asset management we ask our customers for their thoughts and wishes concerning sustainability, which we then implement.

Impacts of sustainability risks

Environmental conditions, social upheavals, and/or poor corporate governance can have negative effects on the value of the investments and assets in the portfolios managed by BPM in a number of ways. These so-called sustainability risks may have a direct impact on the financial position, results of operations, and reputation of individual investments. However, as part of our investment process, we strive to identify and mitigate sustainability risks.

If we succeed in identifying investments with a higher potential for sustainability risks and avoid investing in them, any remaining sustainability risks are likely to have only a minor adverse effect on returns and will not deviate significantly from general market risk. Sustainability risks that we fail to identify in a timely manner or that cannot be identified in advance, on the other hand, may have a considerably greater impact on returns.

No consideration of adverse impacts on sustainability factors

Investment decisions can have adverse impacts on the environment (e.g., the climate, water, biodiversity), on social topics and employees' concerns and also have a detrimental effect on controlling graft and corruption.

BPM takes great interest in taking its responsibility as a financial services provider seriously and to making a contribution to preventing these kinds of impacts when making investment decisions for asset management. However, based on the current circumstances brought about by the existing bureaucratic framework and that which is expected to follow, implementing the statutory provisions to regulate this puts an unreasonable demand on us as an owner-managed mid-sized company. Moreover, fundamental legal questions are still not clear.

So as not to put ourselves at a legal disadvantage, we cannot currently make a public declaration to confirm that we consider the adverse impacts on sustainability factors (environmental concerns, social concerns, etc.) when making decisions about investments or how we go about this. We are therefore obliged to point out on our website that for the time-being we do not consider the adverse impacts on sustainability factors and will not do so until further clarification is forthcoming.

However, we expressly declare that this action does not alter our readiness to make a contribution to doing business in a more sustainable, resource-efficient manner, with the particular goal of reducing the risks and impacts of climate change and other ecological and social problems.